

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**SARAH SOLOMON, *on behalf of
herself and all others similarly situated,***

Plaintiff,

v.

**EQUIFAX INFORMATION SERVICES
LLC,**

Defendant.

Civil Action No. 3:19-cv-0266-JAG

JOINT MOTION FOR ENTRY OF CONSENT ORDER

Plaintiff Sarah Solomon (“Plaintiff”) and Defendant Equifax Information Services LLC (“Equifax”) (collectively, the “Parties”) jointly move for entry of the Proposed Consent Order, which is attached to this Motion as Exhibit 1.

The Parties entered into a settlement, the terms of which are embodied in two separate settlement agreements, to resolve Plaintiff’s claims in this matter. Pursuant to the terms of the Parties’ settlement, Equifax is obligated to undertake certain procedural changes. Also as a condition of settlement, Equifax has sought and Plaintiff’s counsel has agreed to a limited practice restriction, which is subject to the approval of this Court. Both the procedural changes and the practice restrictions are memorialized in the Proposed Consent Order. The Parties now request, for the reasons set forth in Plaintiff’s Memorandum filed concurrently with this Motion and the Proposed Consent Order, that the Court enter the accompanying Proposed Consent Order.

Date: May 22, 2020

Respectfully submitted,

/s/ Emily Connor Kennedy

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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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